

**UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Albert William Bleau Jr.

Plaintiff

Vs.

Greater Lynn Mental Health
& Retardation Association, et al,

Defendants

Civil Action
No. 04 – 10469REK

Plaintiff's Motion Opposing Defendant's

Motion To Plaintiff's Motion For Leave To Conduct Additional Discovery And
Defendant's Cross-Motion For A Protective Order And Plaintiff's Motion
Clarifying Plaintiffs' Motion For Discovery

The plaintiff requests that the Court deny the defendant's motion opposing plaintiff's motion for expanded discovery and that the Court deny the defendant's cross-motion for a protective order. The plaintiff has acted in bad faith and its motion should be denied for not being timely filed under the Federal Rules. Additionally, the defendant's motion would prejudice the plaintiff's claims, cause undo delays, and place unnecessary costs on the plaintiff and the Court.

Plaintiff now submits an accompanying Memorandum of Law supporting plaintiff's Motion.

Respectfully submitted,



Albert W. Bleau Jr.
505 Paradise Rd. #208
Swampscott, MA 01907
(781) 962-2662

Dated: February 16, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of
the above document was served
upon all counsel of record by First
Class Mail on February 16, 2006.


Albert W. Bleau Jr.